

UNITED STATES DISTRICT COURT  
for the  
District of Minnesota

UNITED STATES OF AMERICA

v.

ABRAHAM MAADA LAMIN

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Case No. 15-mj-108 (SER)

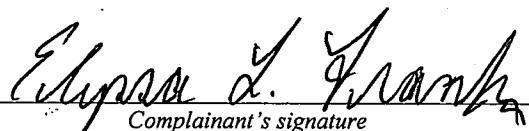
**CRIMINAL COMPLAINT**

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about February 5, 2015, in St. Louis County, in the State and District of Minnesota, defendant, Abraham Maada Lamin, did knowingly, by force, violence, and intimidation, take from the person and presence of a victim teller approximately \$11,150 in United States currency belonging to and in the care, custody, control, management, and possession of the Wells Fargo Bank located in Duluth, Minnesota, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and in committing such offense, did assault and put in jeopardy the life of another person by use of a dangerous weapon, in violation of Title 18, United States Code, Sections 2113(a) and 2113(d).

I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof:  Yes  No

  
\_\_\_\_\_  
Complainant's signature

Elyssa L. Frank, Special Agent

*Printed name and title*

  
\_\_\_\_\_  
Judge's signature

Steven E. Rau, United States Magistrate Judge

SCANNED

*Printed name and title*

FEB 10 2015

Sworn to before me and signed in my presence.

Date: 10 Feb 2015

City and state: St. Paul, Minnesota

STATE OF MINNESOTA )  
COUNTY OF ST. LOUIS ) ss. AFFIDAVIT OF ELYSSA L. FRANK

Your affiant, Elyssa L. Frank, being duly sworn, does state the following is true and correct to the best of her knowledge and belief:

1. I am a Special Agent ("SA") with the Federal Bureau of Investigation ("FBI") and have been so employed since June 2014. I am currently assigned to the Minneapolis, Minnesota, FBI office.

2. Amongst my duties as an FBI Special Agent, I am responsible for the investigation of violations of the federal criminal laws of the United States of America, including violent crimes and bank robberies.

3. This affidavit is submitted in support of a criminal complaint against ABRAHAM MAADA LAMIN who I have probable cause to believe committed armed bank robbery, in violation of Title 18, United States Code, Sections 2113(a) and 2113(d). This affidavit is based on my training, experience, and personal knowledge and investigation as well as on information learned from other law enforcement officers involved in this investigation, and my review of official reports submitted in relation to this investigation.

4. This affidavit is made for the purpose of establishing probable cause in support of a federal arrest warrant and, therefore, contains only a summary of relevant facts relating to the robbery of the Wells Fargo Bank (hereinafter "the Bank") located inside the Cub Foods grocery store located at 617 W. Central Entrance, Duluth, Minnesota, on February 5, 2015.

5. On February 5, 2015, at approximately 12:10 p.m., an unknown male (hereinafter "the robber") approached the teller counter of the Bank. The robber approached the victim teller, brandished a handgun and verbally demanded cash. The victim teller complied with the robber's demand and gave the robber United States currency (hereinafter "currency") from the teller drawer. Some of the currency was wrapped in paper "currency bands." After receiving the currency, the robber put some of it down his pants and exited the Bank and grocery store. The victim teller then activated the silent alarm. The victim teller described the robber as a black male wearing a black, hooded sweatshirt pulled over a Green Bay Packers hat and brandishing a silver handgun.

6. Following the robbery, a bank audit revealed that the robber received approximately \$11,150 in currency during the bank robbery. At the time of the robbery, the deposits of the Bank were insured by the Federal Deposit Insurance Corporation ("FDIC").

7. Shortly after the silent alarm was activated by the victim teller, multiple law enforcement officers arrived near the Bank. Several officers noticed currency on the ground in an area southeast of the Bank. Witnesses also told responding officers that they saw a male holding currency running southeast from the area of the Bank. Law enforcement officers found a dark colored coat containing a handgun and currency near a shed behind a residence located approximately 200 yards from the Bank.

8. Law enforcement officers then entered the Residence Inn Marriott, located approximately 100 yards from the residence where the coat was found. In the lobby area of the hotel, officers approached ABRAHAM MAADA LAMIN who matched the

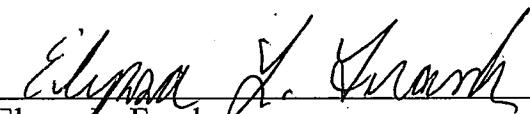
physical description of the robber. Several currency bills and a "currency band" were located inside of the robber's pants.

9. Shortly after the robber was detained, the victim teller positively identified the man in custody as the man who had robbed the Bank. Law enforcement officers identified the robber as ABRAHAM MAADA LAMIN.

10. During a subsequent interview and after being advised of his Miranda rights, LAMIN confessed to robbing the Bank. Among other statements, LAMIN said he used a silver and black colored .380 caliber handgun during the robbery. LAMIN also said he ran to a residence near the Bank after the robbery, left his jacket containing the gun near the residence, and then went to the hotel to call someone to pick him up.

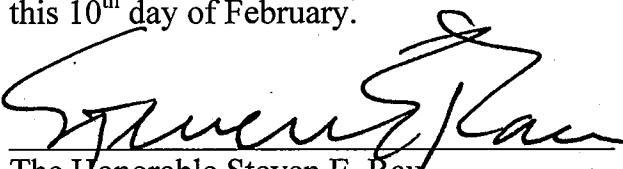
11. Based on the facts set forth above, I submit there is probable cause to believe that ABRAHAM MAADA LAMIN did commit armed bank robbery, in violation of Title 18, United States Code, Sections 2113(a) and 2113(d).

Further your Affiant sayeth not.

  
\_\_\_\_\_  
Elyssa L. Frank  
Special Agent  
Federal Bureau of Investigation

SUBSCRIBED and SWORN to before me

this 10<sup>th</sup> day of February.

  
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The Honorable Steven E. Ray  
U.S. Magistrate Judge